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8 *Interim Class Counsel*

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION
12

13 IN RE CALIFORNIA BAIL BOND
ANTITRUST LITIGATION

Master Case No. 4:19-CV-00717-JST

14
15 THIS DOCUMENT RELATES TO:

16 All Actions
17
18

**DECLARATION OF DEAN M. HARVEY
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SET A
BRIEFING SCHEDULE AND PAGE
LIMITS REGARDING RESPONSES TO
THE SECOND CONSOLIDATED
AMENDED COMPLAINT AND MOTION
TO LIFT DISCOVERY STAY**

19 I, Dean M. Harvey, declare as follows:

20 1. I am a Partner at the law firm of Lief Cabraser Heimann & Bernstein, LLP ("Lief
21 Cabraser"), which has been appointed Interim Class Counsel. I am the lead attorney for this case
22 at Lief Cabraser. I have personal knowledge of the facts herein and, if called upon to testify to
23 those facts, I could and would do so competently.

24 2. During a meet-and-confer call on May 14, 2020, counsel for Defendants informed
25 me they would oppose Plaintiffs' Motion to Lift the Discovery Stay, and that they would all
26 respond to the Second Consolidated Amended Complaint ("SCAC") with motions to dismiss,
27 including even the Defendants for whom the Court previously held Plaintiffs had sufficiently
28 alleged involvement in the alleged conspiracy. During that call and in later email

1 correspondence, the parties attempted to, but could not, reach agreement on page limits for the
2 motions to dismiss, a briefing schedule for Plaintiffs' Motion to Lift the Discovery Stay, or page
3 limits regarding Plaintiffs' Motion to Lift the Discovery Stay.

4 3. Attached hereto as Exhibit A is a true and correct copy of an email chain between
5 myself and defense counsel that contains the relevant email correspondence.

6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct.

8 Executed on the 18th of May, 2020 in San Francisco, California.

9
10 Dated: May 18, 2020

Respectfully submitted,

11 /s/ Dean M. Harvey

12 Dean M. Harvey (SBN 250298)

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